

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Tariff Filing of Aquila, Inc., to)
Implement a General Rate Increase for Retail)
Electric Service Provided to Customers in its)
Aquila Networks—MPS and Aquila Networks—)
L&P Missouri Service Areas.)

Case No. ER-2007-0004
Tariff No. YE-2007-0001

**STAFF’S LATE-FILING OF SCHEDULES TO
DIRECT TESTIMONY OF STAFF WITNESS PHILLIP K. WILLIAMS**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), and late files Schedules PKW-2 and PKW-3 to the direct testimony of Staff witness Phillip K. Williams and, in connection therewith, states:

1. On January 19, 2007, the Commission entered its *Order Granting Motion to Late-file Testimony* in which it granted the Staff leave to late-file the direct testimony of Staff witness Phillip K. Williams that was due to be filed on January 18, 2007.

2. On January 24, 2007, the Staff filed the direct testimony of Staff witness Phillip K. Williams noting two schedules referenced in that testimony were not filed then—Schedules PKW-2 and PKW-3.

3. Staff witness Phillip K. Williams’ mother was removed from life support January 16, 2007. Shortly before this filing, Staff Williams’ mother died and Staff witness Williams returned to work where he finalized Schedules PKW-2 and PKW-3 for filing. The reference to Schedule PKW-2 appearing on page 5 at line 9 refers to the Schedule PKW-2 filed with this pleading. The reference in his direct testimony to Schedule 2 appearing on page 45 at line 10 actually is a reference to Schedule PKW-2 filed with this pleading. Similarly, the reference in his direct testimony to Schedule PKW-2 appearing on page 15 at line 2 is an error, and the correct schedule for that reference is Schedule PKW-3 filed with this pleading.

4. The Staff apologizes for any inconvenience occasioned by the late filing of these schedules.

WHEREFORE the Staff late-files Schedules PKW-2 and PKW-3 to the direct testimony of Staff witness Phillip K. Williams that was due for filing on January 18, 2007.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy General Counsel
Missouri Bar No. 35512

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 22nd day of February 2007.

/s/ Nathan Williams

Aquila, Inc./Db
Aquila Networks
Case No. ER-2007-0004
Analysis of Average Cost Per Kwh For Residential Customers

File Name: Rate Comparison
Prepared By: PKW
Date Prepared: 1/02/2007
Date Printed: 2/22/2007
Time Printed: 9:07 AM

Company	Residential Revenues	Kwh Sales	Cost Per Kwh	Ranking Highest To Lowest
2005				
Aquila, Inc./Db Aquila Networks - MPS	\$ 196,748,147	2,641,650,000	\$ 0.074479	2 nd
Aquila, Inc./Db Aquila Networks - L&P	\$ 44,741,947	749,363,000	\$ 0.059707	5 th
Empire District Electric Company	\$ 149,176,400	1,881,441,000	\$ 0.079288	1 st
Kansas City Power & Light Company	\$ 380,023,411	5,383,096,000	\$ 0.070596	3 rd
Ameren UE (Union Electric)	\$ 936,567,550	13,859,182,000	\$ 0.067577	4 th
2004				
Aquila, Inc./Db Aquila Networks - MPS	\$ 172,391,370	2,365,422,000	\$ 0.072880	2 nd
Aquila, Inc./Db Aquila Networks - L&P	\$ 41,100,616	702,435,000	\$ 0.058512	5 th
Empire District Electric Company	\$ 124,394,139	1,703,858,000	\$ 0.073007	1 st
Kansas City Power & Light Company	\$ 347,085,483	4,902,992,000	\$ 0.070791	3 rd
Ameren UE (Union Electric)	\$ 885,358,283	13,048,599,000	\$ 0.067851	4 th
2003				
Aquila, Inc./Db Aquila Networks - MPS	\$ 166,344,608	2,390,039,000	\$ 0.069599	4 th
Aquila, Inc./Db Aquila Networks - L&P	\$ 40,563,466	710,455,000	\$ 0.057095	5 th
Empire District Electric Company	\$ 125,196,648	1,728,315,000	\$ 0.072439	2 nd
Kansas City Power & Light Company	\$ 181,174,569	2,448,487,000	\$ 0.073994	1 st
Ameren UE (Union Electric)	\$ 931,131,968	12,864,857,000	\$ 0.072378	3 rd
2002				
Aquila, Inc./Db Aquila Networks - MPS	\$ 163,053,788	2,335,239,000	\$ 0.069823	4 th
Aquila, Inc./Db Aquila Networks - L&P	\$ 40,706,093	706,626,000	\$ 0.057606	5 th
Empire District Electric Company	\$ 126,088,402	1,726,449,000	\$ 0.073033	2 nd
Kansas City Power & Light Company	\$ 183,916,767	2,453,539,000	\$ 0.074960	1 st
Ameren UE (Union Electric)	\$ 931,131,968	12,864,857,000	\$ 0.072378	3 rd
2001				
UtiliCorp United, Inc./(Missouri Public Service Div.)	\$ 153,831,575	2,182,523,000	\$ 0.070483	3 rd
UtiliCorp United, Inc./(St. Joseph Power & Light Div.)	\$ 38,439,706	670,640,000	\$ 0.057318	5 th
Empire District Electric Company	\$ 110,584,151	1,681,085,000	\$ 0.065781	4 th
Kansas City Power & Light Company	\$ 348,769,921	4,728,840,000	\$ 0.073754	1 st
Ameren UE (Union Electric)	\$ 908,846,345	12,643,689,000	\$ 0.071881	2 nd
2000				
UtiliCorp United, Inc./(Missouri Public Service Div.)	\$ 153,643,417	2,139,885,000	\$ 0.071800	3 rd
St. Joseph Light & Power	\$ 39,783,197	674,999,000	\$ 0.058938	5 th
Empire District Electric Company	\$ 108,571,833	1,660,928,000	\$ 0.065368	4 th
Kansas City Power & Light Company	\$ 352,095,387	4,725,323,000	\$ 0.074512	1 st
Ameren UE (Union Electric)	\$ 915,855,246	12,635,182,000	\$ 0.072485	2 nd
1999				
UtiliCorp United, Inc./(Missouri Public Service Div.)	\$ 148,200,000	1,956,800,000	\$ 0.075736	1 st
St. Joseph Light & Power	\$ 37,599,754	623,667,000	\$ 0.060288	5 th
Empire District Electric Company	\$ 98,786,901	1,509,175,836	\$ 0.065458	4 th
Kansas City Power & Light Company	\$ 324,091,447	4,287,963,454	\$ 0.075582	2 nd
Ameren UE (Union Electric)	\$ 871,212,000	11,872,621,000	\$ 0.073380	3 rd
1998				
UtiliCorp United, Inc./(Missouri Public Service Div.)	\$ 154,400,000	2,000,398,000	\$ 0.077185	1 st
St. Joseph Light & Power	\$ 38,484,479	634,165,000	\$ 0.060685	5 th
Empire District Electric Company	\$ 100,566,576	1,548,629,943	\$ 0.064939	4 th
Kansas City Power & Light Company	\$ 334,228,069	4,413,732,000	\$ 0.075725	2 nd
Ameren UE (Union Electric)	\$ 865,106,285	12,204,716,041	\$ 0.070883	3 rd

Company	Residential Revenues	Kwh Sales	Cost Per Kwh	Ranking Highest To Lowest
1997				
UtiliCorp United, Inc./ (Missouri Public Service Div.)	\$ 147,599,000	1,833,799,000	\$ 0.080488	1 st
St. Joseph Light & Power	\$ 37,065,955	621,432,000	\$ 0.059646	5 th
Empire District Electric Company	\$ 88,635,799	1,429,787,422	\$ 0.061992	4 th
Kansas City Power & Light Company	\$ 315,240,379	4,087,617,976	\$ 0.077121	2 nd
Ameren UE (Union Electric)	\$ 834,618,100	11,499,116,181	\$ 0.072581	3 rd
1996				
UtiliCorp United, Inc./ (Missouri Public Service Div.)	\$ 142,597,000	1,770,725,000	\$ 0.080530	1 st
St. Joseph Light & Power	\$ 36,428,419	611,911,000	\$ 0.059532	5 th
Empire District Electric Company	\$ 86,014,341	1,440,512,033	\$ 0.059711	4 th
Kansas City Power & Light Company	\$ 306,340,000	3,906,196,000	\$ 0.078424	2 nd
Ameren UE (Union Electric)	\$ 840,459,425	11,549,256,528	\$ 0.072772	3 rd
1995				
UtiliCorp United, Inc./ (Missouri Public Service Div.)	\$ 138,622,965	1,689,696,000	\$ 0.082040	1 st
St. Joseph Light & Power	\$ 36,001,141	593,881,000	\$ 0.060620	4 th
Empire District Electric Company	\$ 81,331,054	1,350,339,907	\$ 0.060230	5 th
Kansas City Power & Light Company	\$ 306,171,000	3,879,975,000	\$ 0.078911	2 nd
Ameren UE (Union Electric)	\$ 843,037,511	11,229,011,259	\$ 0.075077	3 rd

Source: 1995 Thru 1999 Taken from Rebuttal Testimony filed in EM-2000-369, By Phillip K. Williams
2000 thru 2005 Data taken from the Annual Reports
Pages 300 and 301

Additional Value of 2 Units built in	\$ 63,864,717	Supported By Chuck Hyneman
Less: Additional Charges Included in the Base price for Legal costs	\$ 579,394	
Less: The additional Transmission built in	\$ 2,211,353	Supported By Chuck Hyneman
	\$ 61,073,970	

To calculate the MPS Units 1 thru 5

Acct. No.	Total Co. Sept. 30, 2006 Balance		Distribution of MPS Units 1 thru 5		
Actual balances for MPS Units 1, 2 & 3					
340.000	\$ 1,034,874		\$ 1,034,874		
341.000	\$ 9,000,060	7.885%	\$ 13,816,010	1.7500%	\$ 241,780
342.000	\$ 3,950,058	3.461%	\$ 6,063,742	3.0900%	\$ 187,370
343.000	\$ 66,031,053	57.853%	\$ 101,364,398	4.8100%	\$ 4,875,628
344.000	\$ 17,250,057	15.114%	\$ 26,480,596	3.8000%	\$ 1,006,263
345.000	\$ 17,778,976	15.577%	\$ 27,292,541	2.8500%	\$ 777,837
346.000	\$ 125,000	0.110%	\$ 191,888	3.5700%	\$ 6,850
	\$ 115,170,078		\$ 176,244,048		\$ 7,095,728
Less Land	\$ 114,135,204	100.000%			
Total Value of Unit 1 thru 3		\$ 115,170,078			
Added Value for Units 4 & 5		\$ 61,653,364			
Total Value of Unit , thru 3		\$ 176,823,442			

Add an additional amount to Transmission of \$ 2,211,353 Acct # 353 1.7000% \$ 37,593

Analysis of the Monthly Depreciation for MPS Units for Units 1 thru 5

	Monthly Depreciation Acct. 341	Monthly Depreciation Acct. 342	Monthly Depreciation Acct. 343	Monthly Depreciation Acct. 344	Monthly Depreciation Acct. 344	Monthly Depreciation Acct. 345	Monthly Depreciation Acct. 353
July, 2005	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
August, 2005	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
September, 2005	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
October, 2005	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
November, 2005	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
December, 2005	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
January, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
February, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
March, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
April, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
May, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
June, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
July, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
August, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
September, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
October, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
November, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
December, 2006	\$ 20,148	\$ 15,614	\$ 406,302	\$ 83,855	\$ 64,820	\$ 571	\$ 3,133
Cummulative Bal Thru Sept. 30,2006	\$ 302,225	\$ 234,212	\$ 6,094,534	\$ 1,257,828	\$ 972,297	\$ 8,563	\$ 46,991
Cummulative Bal Thru Dec. 31, 2006	\$ 362,670	\$ 281,054	\$ 7,313,441	\$ 1,509,394	\$ 1,166,756	\$ 10,276	\$ 56,390